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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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22 Pursuant to LR IA 6-1 and LR 26-3, Defendants and Plaintiff Eufemia Guillen (“Plaintiff”), by
23 and through their undersigned counsel, hereby stipulate to extend time for the parties to file their
24 proposed Joint Pre-Trial Order from the current deadline of August 1, 2024 through and including
25 August 15, 2024. This is the second request for an extension of this specific deadline. The
26 requested extension is sought in good faith and not for purposes of undue delay. The reasons for the
27 extension are as follows:

1. Plaintiff's counsel, JAMES P. KEMP, ESQ., has been continuing to have to care for his
2 sister who has been hospitalized repeatedly for treatments for a potentially terminal illness
3 and complications that have arisen out of that illness. He is her only family and support in
4 Las Vegas to help in her care. In addition, his sister is an associate attorney at his law firm
5 and he has been having to help cover matters in her cases.
6

7. As result of the above scheduling conflicts Plaintiff's counsel has not had time to address the
8 issues and complete a draft of the proposed Joint Pre-Trial Order. Defense counsel has
9 provided an initial draft and the parties hope to complete a final draft and make any final
10 edits within the next two weeks.
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12. The Parties believe that an additional two weeks should provide enough time to complete
13 and file the proposed Joint Pre-Trial Order.

14 Accordingly, additional time is needed and the parties request that the court grant this extension.

15 IT IS SO STIPULATED.

17 Dated August 1, 2024.

18 KEMP & KEMP

20 /s/ James P. Kemp
21 James P. Kemp, Esq.
Barbara W. Gallagher, Esq.

22 Attorneys for Plaintiff

Dated August 1, 2024.

SIMONS HALL JOHNSTON PC

20 /s/Sandra C. Ketner
21 Anthony L. Hall, Esq.
Sandra C. Ketner, Esq.

22 Attorneys for Defendants

23 IT IS SO ORDERED.



26 Anne R. Traum
27 United States District Judge

28 Dated: August 6, 2024